

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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UNITED STATES OF AMERICA,	)	
	)	Case No. 17-cr-00134 (WMW-DTS)
	)	
Plaintiff,	)	<b>MOTION TO CONTINUE MOTIONS</b>
	)	<b>RESPONSE FILING DATE</b>
v.	)	
	)	
John Kelsey Gammell,	)	
	)	
Defendant.	)	
	)	

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The Defendant John Kelsey Gammell, by and through his attorney, hereby respectfully moves the Court for a continuance of the presently set date for the filing of the response to motions currently set for September 22, 2017.

The parties anticipate charges will be filed against Mr. Gammell in the Districts of New Mexico and Colorado. The Offices of the Federal Public Defender represent Mr. Gammell in both of those Districts in connection with the anticipated charges. To facilitate the discussion of a global resolution to the charges in New Mexico, Colorado, and Minnesota, the parties seek an extension of the deadline by which to respond to motions, currently set for September 22, 2017, to October 16, 2017.

Mr. Gammell need not move the Court to continue trial based on excludable time under 18 U.S.C. § 3161(h)(7)(A) or the statutory period that would otherwise be required under 18 U.S.C. § 3161, since he is not requesting at this time that the motions hearing, currently set for October 30, 2017, be moved. Further, pursuant to the Order of the Court dated September 1, 2017, the Court has already excluded the time between August 30 and October 30, 2017, from

the Speedy Trial Act computations in this case. As such, Mr. Gammell will not file a Statement of Facts in connection with this motion.

The government does not object to this motion. All defense counsel concur with this motion.

For the above reasons, the defendant is requesting that the date set date for the filing of the response to defendant's motions currently set for September 22, 2017, be continued to October 16, 2017.

Dated: September 14, 2017

Respectfully submitted,

By: s/Rachel K. Paulose

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